

ATTACHMENT 1

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July 26, 2002

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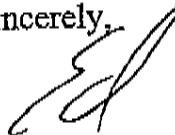
Re: W.R. Grace

Dear Jim:

Enclosed please find some initial written discovery from the ZAI claimants. You will note that I have omitted the usual boilerplate definitions, instructions, etc. that everyone ignores anyway. I have also tried to make the discovery requests "plain english" and eliminate the usual verbiage that confounds many discovery requests. Knowing that you have been in asbestos litigation for many years, it is my hope that we can cut through a lot of the "we do not understand the interrogatory", posturing, etc. and get down to the information that both of us need to prepare for this trial expeditiously and economically.

I am looking forward to working with you again.

Sincerely,



Edward J. Westbrook
ewestbrook@rpwb.com

EJW/kag
Enclosures

cc: David Bernick, Esq.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
W.R. Grace & Co., <u>et al.</u> ,)	Case No. 01-01139 (JKF)
)	(Jointly Administered)
)	
Debtors.)	


ZAI CLAIMANTS' FIRST SET OF INTERROGATORIES TO DEBTORS

1. Identify all fact witnesses Grace intends to call at the "Science Trial" and give a summary of their expected testimony.
2. Identify all tests done on the Libby documents that were provided to the EPA to determine if they were contaminated with asbestos.
3. Identify all cleaning procedures undertaken with respect to the Libby documents to remove asbestos contamination from them.
4. Identify all tests of fiber release from expanded vermiculite, including ZAI, during installation. For each test, please give the date of the test, the location where the test was conducted, identify all individuals who participated in the test, identify the laboratory that analyzed samples from the test and give the results of the test.
5. Identify all tests of fiber release from expanded vermiculite, including ZAI, during disturbance for renovation. For each test, please give the date of the test, the location where the test was conducted, identify all individuals who participated in the test, identify the laboratory that analyzed samples from the test and give the results of the test.
6. Identify all tests of fiber release from expanded vermiculite, including ZAI, during demolition of a facility containing the material. For each test, please give the date of the test, the location where the test was conducted, identify all individuals who participated in the test, identify the laboratory that analyzed samples from the test and give the results of the test.
7. Identify all cases of mesothelioma reported to date among Libby employees, household contacts of Libby employees or Libby area residents.
8. Identify all air testing done in conjunction with the EPA investigation at Libby.

9. Identify all air tests done at Libby after the mine was closed.
10. Identify all tests of settled dust conducted by Grace or of which Grace is aware that were done (a) at Libby, (b) on dust from Libby vermiculite, or (c) on dust from products made from Libby vermiculite.
11. Identify all reentrainment tests concerning asbestos-containing dust done by Grace other than specifically for the Zonolite science trial.
12. Identify all testing of settled dust for asbestos done by Grace other than specifically for the Zonolite science trial.
13. Identify all lawsuits brought against Grace alleging asbestos disease from exposure to Grace's, expanded vermiculite, including ZAI.
14. Identify all cases settled by Grace that alleged asbestos disease from exposure to Grace's expanded vermiculite, including ZAI.
15. Has Grace conducted any type of study to determine the potential number of homes with ZAI? If so, please provide the details of the study and its results.
16. While selling expanded vermiculite, including ZAI, did Grace ever calculate the number of asbestos fibers (or a range of such fibers) in any given volume (e.g. cubic centimeter of ZAI, bag of ZAI, etc.) If so, state when, who performed the test and provide the results.
17. Did Grace ever apply a dust suppressing agent to expanded vermiculite, including ZAI? If so, provide details.
18. Did Grace ever perform any testing on any binding agent designed to prevent the release of asbestos fibers from expanded vermiculite, including ZAI? If so, provide details.
19. Identify all types of asbestos that you or your consultants have identified in Libby vermiculite.
20. Identify all tests of asbestos fiber release into the air during the expansion of Libby vermiculite.
21. While selling ZAI, did Grace ever inform installers of ZAI or homeowners receiving ZAI, that ZAI contained any asbestos fibers?
22. Identify all locations where vermiculite-related documents are stored by Grace.
23. Did Grace ever recommend any precautions to anyone who might disturb asbestos-contaminated dust at Libby?

24. Did Grace ever recommend any precautions to anyone who might disturb asbestos-contaminated dust at the expanding plants?
25. Did Grace ever recommend any precautions to anyone who might disturb asbestos-contaminated dust during installation of expanded vermiculite, including ZAI?
26. Did Grace ever recommend any precautions to anyone who might disturb asbestos-contaminated dust after installation of expanded vermiculite, including ZAI?
27. What precautions does Grace recommend today to individuals who contact Grace about ZAI in their homes?
28. Does Grace believe any precautions are necessary when performing work that may disturb ZAI? If so, please describe the precautions.

RESPECTFULLY SUBMITTED,



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Dated: July 26, 2002

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
W.R. Grace & Co., <u>et al.</u> ,)	Case No. 01-01139 (JKF)
)	(Jointly Administered)
)	
Debtors.)	

ZAI CLAIMANTS' FIRST SET OF REQUESTS TO PRODUCE TO DEBTORS

1. Produce all documents referenced in response to any of the accompanying interrogatories served on Grace.
2. Produce all documents (including pleadings) produced by any party in Maryland Casualty v. W.R. Grace that dealt with or mentioned vermiculite.
3. Produce all documents concerning testing of vermiculite to determine if it released asbestos fibers under conditions of foreseeable use.
4. Produce all documents produced to EPA in connection with its investigation of the Libby, Montana situation.
5. Produce any documents in which Grace discussed the relative toxicity of different types of asbestos fibers.
6. Produce all documents relating to Grace's acquisition of the Zonolite Company that mention (a) any form of asbestos; (b) dust or fiber; or (c) vermiculite contamination.
7. Produce all computerized indices of vermiculite-related documents that concern to any collection of such documents to which Grace has or had access.
8. Produce all Libby-related documents that were previously located in Denver, regardless of their current location.
9. Identify all air testing, settled dust testing and fiber release testing conducted by any third party on expanded vermiculite, including ZAI, of which you are aware.

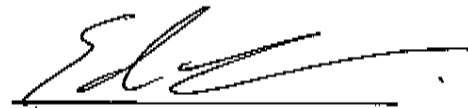
10. Produce all documents relating to patents for vermiculite products or processing.
11. Produce all documents regarding the availability of vermiculite without asbestos during the 1950s to 1980s when expanded vermiculite, including ZAI, from Libby was being sold.
12. Produce all documents from the files of Julie Yang that address vermiculite, tremolite, other contaminants of vermiculite, any type of testing on any of the foregoing, Grace's plans to address the potential hazards of vermiculite or its contaminants, or Grace's contact with government agencies concerning those hazards.
13. Produce all documents from the files of Elwood Wood that address vermiculite, tremolite, other contaminants of vermiculite, any type of testing on any of the foregoing, potential hazards of any of the foregoing, Grace's plans to address the potential hazards of vermiculite or its contaminants, or Grace's contact with government agencies concerning those hazards.
14. Produce all documents from the files of H.C. Duecker that address vermiculite, tremolite, other contaminants of vermiculite, any type of testing on any of the foregoing, Grace's plans to address the potential hazards of vermiculite or its contaminants, or Grace's contact with government agencies concerning those hazards.
15. Produce all documents from the files of H.A. Eschenbach that address vermiculite, tremolite, other contaminants of vermiculite, any type of testing on any of the foregoing, Grace's plans to address the potential hazards of vermiculite or its contaminants, or Grace's contact with government agencies concerning those hazards.
16. Produce all documents from the files of F.W. Eaton that address vermiculite, tremolite, other contaminants of vermiculite, any type of testing on any of the foregoing, Grace's plans to address the potential hazards of vermiculite or its contaminants, or Grace's contact with government agencies concerning those hazards.
17. Produce all documents from the files of W.R. Hanlon that address vermiculite, tremolite, other contaminants of vermiculite, any type of testing on any of the foregoing, Grace's plans to address the potential hazards of vermiculite or its contaminants, or Grace's contact with government agencies concerning those hazards.
18. Produce all documents from the files of R.M. Vining that address vermiculite, tremolite, other contaminants of vermiculite, any type of testing on any of the foregoing, Grace's plans to address the potential hazards of vermiculite or its

contaminants, or Grace's contact with government agencies concerning those hazards.

19. Produce all documents from the files of B.R. Williams that address vermiculite, tremolite, other contaminants of vermiculite, any type of testing on any of the foregoing, Grace's plans to address the potential hazards of vermiculite or its contaminants, or Grace's contact with government agencies concerning those hazards.
20. Produce all documents from the files of J.W. Wolter that address vermiculite, tremolite, other contaminants of vermiculite, any type of testing on any of the foregoing, Grace's plans to address the potential hazards of vermiculite or its contaminants, or Grace's contact with government agencies concerning those hazards.
21. Produce all documents from the files of C.C. Ou that address vermiculite, tremolite, other contaminants of vermiculite, any type of testing on any of the foregoing, Grace's plans to address the potential hazards of vermiculite or its contaminants, or Grace's contact with government agencies concerning those hazards.
22. Produce all documents from the files of S.C. Vaughan that address vermiculite, tremolite, other contaminants of vermiculite, any type of testing on any of the foregoing, Grace's plans to address the potential hazards of vermiculite or its contaminants, or Grace's contact with government agencies concerning those hazards.
23. Produce all documents from the files of O.M. Favorito that address vermiculite, tremolite, other contaminants of vermiculite, any type of testing formed on any of the foregoing, Grace's plans to address the potential hazards of vermiculite or its contaminants, or Grace's contact with government agencies concerning those hazards.
24. Produce all documents from the files of R.C. Ericson that address vermiculite, tremolite, other contaminants of vermiculite, any type of testing on any of the foregoing, Grace's plans to address the potential hazards of vermiculite or its contaminants, or Grace's contact with government agencies concerning those hazards.
25. Produce all documents from the files of W.F. McCord that address vermiculite, tremolite, other contaminants of vermiculite, any type of testing on any of the foregoing, Grace's plans to address the potential hazards of vermiculite or its contaminants, or Grace's contact with government agencies concerning those hazards.

26. Produce all documents from the files of R. Locke that address vermiculite, tremolite, other contaminants of vermiculite, any type of testing on any of the foregoing, Grace's plans to address the potential hazards of vermiculite or its contaminants, or Grace's contact with government agencies concerning those hazards.
27. Produce all documents from the files of L. Rosenblatt that address vermiculite, tremolite, other contaminants of vermiculite, any type of testing on any of the foregoing, Grace's plans to address the potential hazards of vermiculite or its contaminants, or Grace's contact with government agencies concerning those hazards.
28. Produce all documents from the files of B.A. Blessington that address vermiculite, tremolite, other contaminants of vermiculite, any type of testing on any of the foregoing, Grace's plans to address the potential hazards of vermiculite or its contaminants, or Grace's contact with government agencies concerning those hazards.
29. Produce any documents from the chronological file with J. Peter Grace that concern Libby, vermiculite, tremolite, or any potential hazards of any of the foregoing.

RESPECTFULLY SUBMITTED,



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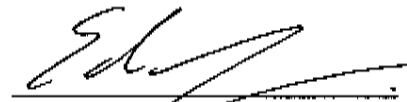
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)	
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)	(Jointly Administered)
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Debtors.)	

ZAI CLAIMANTS' FIRST SET OF REQUESTS TO ADMIT TO DEBTORS

1. Asbestos in ZAI cannot be seen with the naked eye.
2. Grace has never located a home in which ZAI was installed where no asbestos was found in the settled dust in the vicinity of ZAI.
3. Tremolite in ZAI served no utilitarian purpose.
4. Tremolite in ZAI was referred to by Grace as a "tramp" mineral.
5. Grace desired to sell vermiculite without tremolite.
6. Grace was never able to sell vermiculite from Libby that had all the asbestos removed.
7. Grace closed its Libby mining operation while the location still contained large quantities of vermiculite because of Grace's concern about the asbestos contamination of the vermiculite.
8. Grace replaced the vermiculite in its previously vermiculite-based products with perlite that is not contaminated with asbestos.
9. Asbestos in the vermiculite at Libby has caused death and disease.

RESPECTFULLY SUBMITTED,



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